

PHILIP ARGYROPOULOS 30b6  
FARAH JEAN FRANCOIS vs VICTORY AUTO GROUP

November 28, 2022

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1  
2 UNITED STATES DISTRICT COURT  
3 SOUTHERN DISTRICT OF NEW YORK  
4 -----X

5 FARAH JEAN FRANCOIS,

6 Plaintiff,

7 -against-

Case "No.":  
1:22-cv-4447-JSR

8 VICTORY AUTO GROUP LLC d/b/a  
9 VICTORY MITSUBISHI, SPARTAN  
10 AUTO GROUP LLC d/b/a VICTORY  
11 MITSUBISHI, STAVROS ORSARIS,  
12 YESSICA VALLEJO, DAVID PEREZ,  
13 DIANE ARGYROPOULOS, and  
14 PHILIP ARGYROPOULOS,

15 Defendants.

16 -----X

17 REMOTE DEPOSITION of PHILIP ARGYROPOULOS, a  
18 30(b)1 and 30(b)(6) witness herein, witness  
19 located in New York, held on November 28, 2022,  
20 commencing at 2:05 p.m., and before Helene Gruber,  
21 a certified shorthand reporter and notary public  
22 within and for the state of New York.  
23  
24  
25

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A P P E A R A N C E S:

THE LAW OFFICE OF AHMAD KESHAVARZ

Attorneys for Plaintiff

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Brooklyn, New York 11241

BY: EMMA CATERINE, ESQ.

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BY: NICHOLAS GOODMAN, ESQ.

S T I P U L A T I O N S

IT IS HEREBY STIPULATED AND AGREED,  
by and between the attorneys for the respective  
parties, as follows:

All objections, except as to the form  
of the questions, shall be reserved to the time  
of the trial.

The within examination may be signed  
and sworn to before any Notary Public with the  
same force and effect as if signed and sworn to  
before the court.

Filing of the original transcript of  
the examination is waived.

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1 P. Argyropoulos

2 COURT REPORTER: Please state your  
3 name and business address.

4 THE WITNESS: Philip Argyropoulos,  
5 3018 Broadway, Astoria, New York 11106.

6 (The parties stipulate to the witness  
7 being sworn in remotely.)

8 PHILIP ARGYROPOULOS,  
9 Having first been duly sworn, was examined and  
10 testified as follows:

11 EXAMINATION

12 BY MS. CATHERINE:

13 Q. Good afternoon. Could you please  
14 state your full name for the record?

15 A. Philip Argyropoulos.

16 Q. Have you gone by any other names or  
17 aliases?

18 MR. GOODMAN: Phil, you can answer  
19 the question.

20 THE WITNESS: I said "no."

21 Q. Sorry I didn't hear you.

22 A. Okay.

23 Q. So I notice some of the documents  
24 spell your last name in different ways. Does  
25 it have different spellings, or are those

1 P. Argyropoulos

2 misspellings?

3 A. It does not. There is only one  
4 spelling.

5 Q. Have you had your deposition taken  
6 before?

7 A. Yes.

8 Q. What was the nature of the suit?

9 A. I don't remember. It was a long time  
10 ago.

11 Q. About how long ago?

12 A. Over ten years, maybe fifteen.

13 Q. What was your role in the case?

14 A. I don't remember.

15 Q. Were you a defendant or a plaintiff?

16 A. Don't remember. I don't remember.  
17 I'm sure both.

18 Q. Have you testified in a court  
19 proceeding?

20 A. In open court?

21 Q. Yes, sir.

22 A. No.

23 Q. Did you testify in the lawsuit by the  
24 New York Attorney General against Victory Auto  
25 Group LLC?

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1 P. Argyropoulos

2 MR. GOODMAN: Object to the form, as  
3 to "testify," but go ahead.

4 A. No.

5 MS. CATHERINE: Since he is not in  
6 your office, Nicholas, should I email him  
7 exhibits, or how would you like to do those?

8 MR. GOODMAN: You can email both of  
9 us. I have already emailed him, forwarded him,  
10 your email with the supplemental exhibits. If  
11 there are other exhibits, then you will need to  
12 email them.

13 MS. CATHERINE: This one was in the  
14 supplemental.

15 Let's start with Exhibit 34, please.

16 (Affidavit in support of respondent's  
17 motion marked Defendants' Exhibit 34.)

18 MR. GOODMAN: Just to verify we are  
19 on the same exhibit, this is the affidavit in  
20 support of respondent's motion in the State  
21 Attorney General case?

22 MS. CATHERINE: Yes.

23 MR. GOODMAN: Phil, do you have that  
24 in front of you?

25 THE WITNESS: I have it.

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2 Q. What is this document?

3 A. It's a document about a case.

4 Q. And this document was prepared by  
5 your attorney in this case, correct?

6 A. Yes. I thought the questions today  
7 had to do with some sort of alleged fraud.  
8 What does this case -- why am I being asked  
9 about this case?

10 Q. If you go to the page stamped  
11 Francois 1452.

12 THE WITNESS: Nick, can you jump in  
13 here? I don't know what that means.

14 MR. GOODMAN: What what means? Go to  
15 1452?

16 THE WITNESS: What is 1452?

17 MR. GOODMAN: I am sorry, Emma. I am  
18 just trying to explain to him. It is on the  
19 bottom of the page. That's a Bates stamp  
20 number.

21 THE WITNESS: I see what you are  
22 saying. I got it.

23 Q. So you state in this affidavit you  
24 were only occasionally at Victory Auto Group.  
25 What did you mean by that?

1 P. Argyropoulos

2 A. Again, why am I being asked about  
3 this case? We are not -- the subject matter of  
4 this deposition has nothing to do with this  
5 case, so can you tell me why you are asking  
6 about this case?

7 MS. CATHERINE: Strike the  
8 nonresponsive answer to the question.

9 Q. Can you please answer the question,  
10 sir?

11 A. I am an attorney. Did you hear that  
12 part at the beginning of the deposition? I am  
13 asking you why are you asking about an  
14 unrelated case, and why would I need to answer  
15 that question?

16 Q. Are you going to answer the question?

17 A. I don't see a reason to unless my  
18 attorney directs me to. This case has nothing  
19 to do with your action.

20 MR. GOODMAN: Well, I mean, by  
21 counsel, I think the witness would certainly  
22 appreciate an explanation of the connection  
23 between the State Attorney General case and the  
24 case that we are here about. I would also  
25 appreciate that.



1 P. Argyropoulos

2 I would also point out that inquiry  
3 about the State Attorney General action is the  
4 subject of a pending motion before Judge Rakoff  
5 to strike references to it from the pleading.

6 Having said that, I did not object,  
7 and I don't see -- I think that we should go  
8 forward and answer these preliminary questions.  
9 If it gets any further, we will take whatever  
10 action is appropriate, but for now, I would  
11 suggest, Phil, that you just go ahead and  
12 answer the question.

13 A. Please state the question again.

14 Q. Sure. In this affidavit you state  
15 that you were only occasionally at the Victory  
16 Auto Group dealership. What did you mean by  
17 that?

18 A. Exactly what it says. I was only  
19 occasionally there.

20 Q. How often does that mean? Were you  
21 there every week?

22 A. No.

23 Q. Every month?

24 A. Maybe two, three times a year.

25 Q. And that was the dealership at 4070

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2 Boston Road; is that correct?

3 MR. GOODMAN: Object to the form, and  
4 time frame.

5 A. Correct.

6 MR. GOODMAN: Was that an answer to  
7 the question? I am not clear what happened on  
8 the record here.

9 A. Do you want to ask it again?

10 Q. Did you say "yes"?

11 A. I said "yes."

12 Q. Are you aware that one of your former  
13 employees testified in a deposition in another  
14 case that you were at the dealership every  
15 Saturday?

16 A. I am not aware of that.

17 Q. But you deny that; is that correct?

18 A. Yes.

19 MR. GOODMAN: Again, object to form  
20 as to time frame. When are we talking about?

21 Q. If you could take a look at  
22 Exhibit 35, please.

23 (Stipulation of settlement and order  
24 marked Defendants' Exhibit 35.)

25 MR. GOODMAN: Hang on. Let me --

1 P. Argyropoulos

2 MS. CATHERINE: Go ahead. If at this  
3 point you want to get the Court on the phone as  
4 to the pending motion to strike, just let me  
5 know.

6 MR. GOODMAN: No. I am going to wait  
7 to hear the questions and preserve the  
8 potential of objecting and getting the Court on  
9 the line if that turns necessary, but we can  
10 proceed.

11 MS. CATHERINE: Okay.

12 MR. GOODMAN: Just to be clear, this  
13 is stipulation of settlement and order in the  
14 State Attorney General action?

15 MS. CATHERINE: That's correct.

16 MR. GOODMAN: Go ahead.

17 Q. What is this document?

18 MR. GOODMAN: Object to form. Go  
19 ahead.

20 A. Exactly what it says, stipulation of  
21 settlement and order.

22 Q. On the page marked Francois 3682,  
23 where it talks about a judgment being asserted  
24 against you personally and individually if the  
25 respondents default, do you see that?

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2 A. I do.

3 Q. Why did you agree to have a judgment  
4 entered against you personally if the  
5 dealership defaulted?

6 MR. GOODMAN: Object to form. You  
7 can answer.

8 A. That was part of the settlement  
9 negotiation.

10 Q. If I ask you a question during this  
11 deposition today and you do not understand it,  
12 will you please ask me to rephrase the  
13 question?

14 A. Yes, I will.

15 Q. If I ask a question and you don't ask  
16 me to rephrase, is it reasonable to assume you  
17 understood the question?

18 A. Yes.

19 Q. And I know you are an attorney so you  
20 probably don't need a reminder, but if you  
21 could please orally answer rather than nodding  
22 or saying "uh huh." Do you understand?

23 A. Yes, I think I do.

24 Q. How old are you?

25 A. Sixty-nine.

1 P. Argyropoulos

2 Q. What is your date of birth?

3 A. I don't think I want to put that on  
4 the record.

5 MR. GOODMAN: If we can leave a blank  
6 in the transcript or we can communicate it  
7 outside the record, if necessary, that's fine.

8 MS. CATHERINE: That's fine.

9 Q. What is your height, sir?

10 MR. GOODMAN: Same thing with the  
11 other depositions. I don't think we need to  
12 get into that. I will accept service of the  
13 subpoena for trial purposes or otherwise.

14 MS. CATHERINE: So there have been  
15 persons identified by height by a number of  
16 different witnesses, so we are just trying to  
17 include or exclude people based on those  
18 descriptions.

19 MR. GOODMAN: Well, I object and  
20 suggest that you would have to have more of a  
21 foundation for the potential that this witness  
22 was one of those people before we get into his  
23 height and weight.

24 MS. CATHERINE: I mean, that might be  
25 the case for introducing it into evidence, but

1 P. Argyropoulos

2 I don't think that would be the case for  
3 discovery in a deposition.

4 A. It's okay. I'm sick. I don't feel  
5 good. I think I have the flu. Let's move on.

6 Q. Sorry to hear that.

7 A. This is obviously not the way a  
8 deposition is done, but let's do it. 5'11 and  
9 3/4. Do you want my weight?

10 Q. Yes, please.

11 A. 220. Do you want my hair color?  
12 Gray. You want my shoe size?

13 Q. That's not necessary. Thank you.

14 A. I want to move along. I don't feel  
15 good today.

16 Q. What phone numbers do you use in  
17 connection with the Victory Auto Group or  
18 Spartan Auto Group dealerships?

19 A. I don't know what that means.

20 MR. GOODMAN: Objection to form.

21 A. I use, what does that mean, I use  
22 phone numbers? My office phone number, the  
23 dealership's phone number? What does it mean?

24 Q. Sure. Let me rephrase the question.  
25 When you are conducting business for the

1 P. Argyropoulos  
2 Victory Mitsubishi dealership, what phone do  
3 you use?

4 MR. GOODMAN: Objection.

5 A. I don't conduct business for the  
6 dealership. My phone is my office number.

7 Q. What is that number?

8 A. (718) 777-1777.

9 Q. Is that a landline?

10 A. Yes.

11 Q. Where do you currently reside?

12 A. New York.

13 Q. The County of New York?

14 A. Manhattan and Nassau and Suffolk.

15 Q. Do you use any virtual phone  
16 providers like Google Voice or WhatsApp?

17 MR. GOODMAN: Object to form. Go  
18 ahead.

19 A. No.

20 Q. What is your email address?

21 A. Phila@argylaw.com.

22 Q. Do you use any other email addresses?

23 A. No.

24 Q. Do you use a cell phone other than  
25 for personal use?

1 P. Argyropoulos

2 A. No.

3 Q. What steps did you take to prepare  
4 for your deposition today?

5 A. Just reviewed some old documentation.

6 Q. And when did you do that?

7 A. This morning.

8 Q. And what were those documents?

9 A. Ownership documents.

10 Q. What is your understanding about this  
11 case?

12 MR. GOODMAN: Object to form.

13 A. The question is way too general. I  
14 don't understand that question.

15 Q. Sure. Do you understand what the  
16 subject matter of this lawsuit is about?

17 MR. GOODMAN: Object to form.

18 A. From what I know, it's some sort of  
19 frivolous claim about some sort of fraud that  
20 never occurred.

21 Q. Prior to your deposition -- excuse  
22 me. Prior to your preparation for the  
23 deposition in this case, had you reviewed the  
24 documents that you reviewed this morning?

25 A. No. In the past, I reviewed it,



1 P. Argyropoulos

2 sure.

3 Q. When were you first aware of Ms.  
4 Francois' allegation that she had been the  
5 victim of identity theft?

6 A. Month or two ago when I was told by  
7 Mr. Goodman that I was supposed to be deposed.

8 Q. Have you searched for any documents  
9 in relation to this case?

10 MR. GOODMAN: Object to the form.  
11 You can answer.

12 A. Too general a question. You have to  
13 explain what you mean by that.

14 Q. Have you searched your emails for  
15 emails about this case?

16 A. No.

17 Q. Have you searched for text messages  
18 about Ms. Francois or the fraud against her?

19 A. No.

20 Q. Have you communicated with Stavros  
21 Orsaris about this case?

22 A. No.

23 Q. Have you communicated with Yessica  
24 Vallejo about this case?

25 A. No. I don't even know who that is.

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2 Q. Have you communicated with Diane  
3 Argyropoulos about this case?

4 MR. GOODMAN: Note my objection. Go  
5 ahead.

6 A. Just as far as telling her I had a  
7 deposition today.

8 Q. Have you communicated with Chris  
9 Orsaris about this case?

10 A. No.

11 Q. Have you communicated with David  
12 Perez about this case?

13 A. Don't know who that is.

14 Q. Let me know if you need to get a  
15 water or take a break.

16 A. I will. Thank you.

17 Q. Where did you graduate from high  
18 school?

19 A. Bronx Science.

20 Q. What year was that?

21 A. I don't remember. I'm old.

22 Q. Fair enough. Where did you go to law  
23 school?

24 A. University of Bridgeport.

25 Q. When did you graduate from there?

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2 A. I think it was 80 -- late 80s.

3 Q. Have you been practicing law since  
4 that time?

5 A. Since I was admitted I have been  
6 practicing.

7 Q. When were you admitted?

8 A. 1990.

9 Q. When did you get involved in the  
10 business of car dealerships?

11 A. 2004.

12 Q. What got you interested in it?

13 A. I was approached by a friend/client  
14 and asked if I would be an investor in a  
15 dealership.

16 Q. What was the name of that friend?

17 A. Nick. I don't remember his last  
18 name.

19 MR. GOODMAN: It wasn't me.

20 MS. CATERINE: Fair enough.

21 Q. Was this for the Laremont Mitsubishi  
22 dealership?

23 MR. GOODMAN: Object to form. You  
24 mean Larchmont?

25 A. Larchmont, and the answer is no.

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2 Q. But you were an owner of the  
3 Larchmont Mitsubishi dealership, correct?

4 MR. GOODMAN: Object to form.

5 A. Yes.

6 Q. When did you become an owner of that  
7 dealership?

8 A. About 2012, '13, or '14.

9 Q. Larchmont Mitsubishi was a d/b/a,  
10 correct?

11 A. Yes.

12 Q. And what was the LLC that was  
13 operating the dealership?

14 A. Victory Motors LLC.

15 Q. When was Victory Motors LLC founded?

16 A. Not sure. '12 or '13.

17 Q. When was Victory Auto Group LLC  
18 founded?

19 A. 2004, 2005.

20 Q. Were you a founding member of Victory  
21 Auto Group LLC?

22 MR. GOODMAN: Object to form.

23 A. Yes.

24 Q. What was the first dealership that  
25 Victory Auto Group LLC operated?

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2 A. Bronx Suzuki.

3 Q. Where was Bronx Suzuki?

4 MR. GOODMAN: You want a street  
5 address? Object to form.

6 A. The same place where Victory  
7 Mitsubishi is now.

8 Q. And that's 4070 Boston Road?

9 A. Correct.

10 Q. Starting in 2004, what were your  
11 responsibilities as an owner of Victory Auto  
12 Group LLC?

13 A. Nothing. I was just an investor,  
14 like I said.

15 Q. So you provided capital for the  
16 dealership?

17 A. Yes.

18 Q. Did you do anything else for the  
19 dealership other than provide capital?

20 A. No. Maybe some legal advice,  
21 occasional legal advice. That's it.

22 Q. Did you have a retainer with Victory  
23 Auto Group?

24 A. No. It was gratis.

25 Q. Has any customer ever made a

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2 complaint against Victory Mitsubishi that they  
3 were ripped off by Victory Mitsubishi?

4 MR. GOODMAN: Object to form. Again,  
5 time frame.

6 THE WITNESS: I wouldn't know the  
7 answer anyway. The answer is I don't know.

8 Q. Has any consumer ever alleged that  
9 Victory Mitsubishi deceived them other than in  
10 the instant lawsuit in the sales --

11 MR. GOODMAN: Object -- sorry. Go  
12 ahead.

13 Q. -- in the sales or financing of a  
14 vehicle?

15 MR. GOODMAN: Object to form.

16 A. I do not know.

17 Q. Have there ever been any complaints  
18 by a government entity that Victory Mitsubishi  
19 defrauded or deceived consumers in the sales or  
20 financing of vehicles?

21 MR. GOODMAN: Object to the form of  
22 the question.

23 A. Other than the AG action you asked me  
24 about, I don't know.

25 Q. This friend of yours who provided the

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2 opportunity to be an owner of Victory Auto  
3 Group LLC, was he also a founding member of the  
4 LLC?

5 A. It was a 50-50 partnership.

6 MR. GOODMAN: Wasn't the testimony he  
7 was about Victory -- was it Victory Auto Group  
8 or Victory some other LLC?

9 MS. CATHERINE: Victory Motors LLC.  
10 That was the one founded in 2012, correct?

11 A. That's correct.

12 Q. Is the ownership split still 50-50  
13 with Victory Auto Group LLC today?

14 A. With the original partner, Nick?

15 Q. Yes.

16 A. No. He surrendered his ownership in  
17 2008.

18 Q. Did a new partner step in?

19 A. No.

20 Q. So you were the owner entirely in  
21 Victory Auto Group at that point; is that  
22 correct?

23 A. That is correct.

24 Q. Are you still the sole owner of  
25 Victory Auto Group today?

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2 MR. GOODMAN: Object to form. Go  
3 ahead.

4 A. Victory Auto Group is not operating  
5 since 2018, but I don't know if it has been  
6 dissolved yet. I haven't dissolved it. I  
7 don't know if the accountants dissolved it, but  
8 it is a non-operational company.

9 Q. So up until, I believe you said,  
10 2018, up until then, were you the sole owner of  
11 Victory Auto Group LLC?

12 MR. GOODMAN: Object to form.

13 A. Yes.

14 Q. Sorry?

15 A. I said "yes."

16 MR. GOODMAN: What was the answer?

17 THE WITNESS: Yes.

18 Q. If you could take a look at  
19 Exhibit 36, please.

20 (Local Rule 56.1 statement marked  
21 Defendants' Exhibit 36.)

22 Q. What is this document?

23 MR. GOODMAN: Object to form. You  
24 can answer.

25 A. I don't know what this is.



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1 P. Argyropoulos

2 Q. Do you recall this lawsuit against  
3 you by Anthony Nelson?

4 A. Yes.

5 Q. Prior to your preparation for this  
6 deposition today, had you ever reviewed this  
7 document?

8 A. I don't remember. It's possible.

9 Q. Do you see paragraph 1 on this first  
10 page marked Francois 1001?

11 A. Yes.

12 Q. Is the statement in that paragraph  
13 correct?

14 MR. GOODMAN: Object to form. You  
15 can answer.

16 A. What was the date of this document?

17 Q. I believe the date is at the top  
18 there.

19 A. Hang on a second. November 11 of  
20 '20. It says is -- okay. What is your  
21 question?

22 Q. Is that statement correct?

23 A. It's correct to the extent of Spartan  
24 Auto Group operated the dealership at that  
25 address on that date. Victory Auto Group was

1 P. Argyropoulos

2 not in business on that date.

3 Q. So when did Victory Auto Group cease  
4 to operate the dealership at that address?

5 A. End of '17, maybe into the first  
6 month of '18 at most.

7 Q. And that's because Spartan Auto Group  
8 was created and took over operation of the  
9 dealership; is that correct?

10 A. Correct.

11 MR. GOODMAN: Object to form. What  
12 was the answer?

13 THE WITNESS: "Correct."

14 Q. Who is Chris Orsaris?

15 MR. GOODMAN: Object to form.

16 A. Chris is the buyer/inventory manager  
17 of Spartan Auto Group.

18 Q. How long have you known Chris  
19 Orsaris?

20 A. 24, 25 years.

21 Q. If I am doing my math correctly, you  
22 knew him prior to your involvement with Victory  
23 Auto Group LLC; is that correct?

24 A. Yes.

25 Q. How did you know Mr. Orsaris?

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2 A. We had mutual friends.

3 Q. Did Mr. Orsaris do work for Victory  
4 Auto Group LLC?

5 MR. GOODMAN: Object to form.

6 A. I think he did for a short while.  
7 Not sure. I think so.

8 Q. And was it similar to the work that  
9 he does for Spartan Auto Group LLC?

10 A. Yes.

11 Q. Could you explain to me what exactly  
12 it is he does as a buyer for Victory  
13 Mitsubishi?

14 A. He buys the cars from the auction.

15 Q. So he buys cars at auction to be sold  
16 at Victory Mitsubishi; is that correct?

17 A. Correct.

18 Q. Are you aware of Mr. Orsaris'  
19 criminal history?

20 A. Yes, I am.

21 Q. Who made the decision to hire Mr.  
22 Orsaris at Victory Auto Group LLC?

23 A. Diane and -- Diane.

24 Q. You didn't have any involvement in  
25 that decision?

1 P. Argyropoulos

2 MR. GOODMAN: Object to form.

3 A. I don't remember. She might have  
4 asked me what I thought about bringing him  
5 aboard. It's possible.

6 Q. For Spartan Auto Group LLC, who made  
7 the decision to hire Mr. Orsaris?

8 MR. GOODMAN: Object to form.

9 A. Diane.

10 Q. Did she ask for your input with that  
11 decision?

12 MR. GOODMAN: Object to form.

13 A. She may have.

14 MR. GOODMAN: Can you hang on one  
15 second? I am going to be off screen for one  
16 second.

17 MS. CATHERINE: Sure.

18 (Pause in the proceedings.)

19 Q. How would you describe Mr. Orsaris'  
20 appearance?

21 MR. GOODMAN: Appearance?

22 MS. CATHERINE: Yes.

23 MR. GOODMAN: Talking about Chris  
24 Orsaris?

25 MS. CATHERINE: Yes, Chris Orsaris'

1 P. Argyropoulos

2 appearance in terms of height and weight.

3 MR. GOODMAN: Object to form. Go  
4 ahead.

5 A. I don't know. Maybe 5'7, 150, 160.  
6 Sometimes clean shaven, sometimes beard. I  
7 don't see him that much.

8 Q. When was the last time you saw him,  
9 approximately?

10 A. It was about a week or so at a party.

11 Q. Is he a salaried employee at Victory  
12 Mitsubishi?

13 A. I don't know that.

14 Q. Would he have been working for  
15 Victory Mitsubishi in September of 2020?

16 MR. GOODMAN: Object to form.

17 A. Yes.

18 Q. Have you ever met with him at the  
19 dealership?

20 A. It's possible. I can't specifically  
21 remember.

22 Q. What is the job application process  
23 at Victory Mitsubishi?

24 A. I don't know.

25 MR. GOODMAN: Object to form.

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2 A. I have no clue.

3 Q. Who would set the job application  
4 process at Victory Mitsubishi?

5 A. No idea.

6 Q. Are you consulted in regards to  
7 hiring decisions?

8 MR. GOODMAN: Object to form. Go  
9 ahead.

10 A. No, I am not.

11 Q. What information does Victory  
12 Mitsubishi ask for in job applications?

13 A. I already answered that. I don't  
14 know about applications. Now you are asking me  
15 about what's in it? I have no idea.

16 Q. How often do you go into the  
17 dealership in person?

18 MR. GOODMAN: Objection. Form.

19 A. Two or three times a year.

20 Q. Did how often you came in change  
21 because of the COVID-19 pandemic?

22 A. Repeat that question. I didn't  
23 understand that question.

24 Q. Sure. A lot of people have switched  
25 to doing more remote work because of the

1 P. Argyropoulos

2 COVID-19 pandemic, generally starting in the  
3 year 2020. Was that the case for you in  
4 regards to the dealership?

5 A. In what way? Do you mean did I go  
6 there during COVID?

7 Q. Sure. Let's go with that question  
8 first.

9 A. I don't remember going there at all  
10 during the height of COVID, let's say.

11 Q. So you don't recall going there in  
12 the year 2020?

13 A. Correct.

14 Q. Who runs payroll at Victory  
15 Mitsubishi?

16 MR. GOODMAN: Object to form.

17 A. Either Diane or the controller.

18 Q. Who would be the payor for employees  
19 at Victory Mitsubishi?

20 A. Payor meaning who? What company?

21 Q. Yes.

22 A. I have no idea.

23 Q. Do some employees have a different  
24 payor than others?

25 A. I have no idea.

1 P. Argyropoulos

2 Q. When is the last time you received  
3 compensation for your role as an owner at  
4 Victory Auto Group?

5 A. I don't receive -- oh, as an owner?  
6 I wouldn't recall.

7 Q. Would it be sometime around 2017?

8 A. I don't remember.

9 Q. How about at Spartan Auto Group?

10 A. Again, I wouldn't remember. I am not  
11 an owner so I don't receive any compensation.

12 Q. But you were an owner of --

13 A. I don't remember. I don't remember  
14 when there was a payment made to me.

15 Q. Both Spartan Auto Group and Victory  
16 Auto Group did business under the name  
17 Mitsubishi, correct?

18 A. Victory Auto Group never had a d/b/a  
19 of Victory Mitsubishi. It had other d/b/a's.

20 Q. What are those d/b/a's?

21 A. I don't recall. Bronx Suzuki was one  
22 of them that I remember. It might have also  
23 been Victory Suzuki. Don't get confused.

24 Q. Did Victory Motors ever operate under  
25 the name Victory Mitsubishi?



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2 A. Yes, they did, until they closed.

3 Q. When was that?

4 A. I don't remember. I think it was in  
5 '17.

6 Q. During the shutdown of Victory Auto  
7 Group and the opening of Spartan Auto Group,  
8 was there any change of managers or employees  
9 at that time at the dealership?

10 A. I wouldn't know that.

11 Q. Have you ever fired an employee of  
12 Victory Mitsubishi?

13 A. Not me.

14 Q. Who would make those decisions?

15 A. Diane or the general manager.

16 Q. Has an employee ever been fired for  
17 engaging in fraud?

18 MR. GOODMAN: Object to the form.

19 A. I don't know, but I am sure, I am  
20 sure that they have.

21 MR. GOODMAN: Just so I am clear,  
22 Emma, you are asking -- the question you are  
23 asking is framed as Victory Mitsubishi, which  
24 is a d/b/a, so I guess I am just trying to  
25 clarify for myself. I object to the form as to

1 P. Argyropoulos

2 whether you are asking for any of the specific  
3 LLCs we have been talking about.

4 Having said that, go ahead.

5 Q. Did you collect a salary at Victory  
6 Auto Group LLC?

7 A. I don't think so. I don't remember.

8 Q. Did you collect a salary at Spartan  
9 Auto Group LLC?

10 A. When?

11 Q. At any time.

12 A. I think I was at one point salaried,  
13 but I don't remember exactly if it was for  
14 legal fees for consulting.

15 MR. GOODMAN: She is asking salary.

16 A. It's possible.

17 Q. Do you receive any other compensation  
18 from Spartan Auto Group LLC other than a  
19 salary?

20 A. I think I get free oil changes.

21 Q. That's nice.

22 A. Yeah.

23 Q. Did you receive any other  
24 compensation other than a salary at Victory  
25 Auto Group LLC?

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2 A. No, I don't think so.

3 Q. Who is Diane Argyropoulos?

4 A. The owner of the company.

5 MR. GOODMAN: Which company?

6 A. Spartan Auto Group.

7 Q. Was she an owner of Victory Auto

8 Group LLC?

9 A. No.

10 Q. Was she a manager at Victory Auto

11 Group LLC?

12 A. Yes.

13 Q. When did she start as a manager at

14 Victory --

15 A. Both were November of 2008. She took  
16 over the operation of all automobile sales.

17 Q. And she is your wife, correct?

18 A. Correct.

19 Q. When were you married?

20 A. '83.

21 Q. When she started as a manager of  
22 Victory Auto Group, was she a salaried  
23 employee?

24 A. I don't remember if she took salary  
25 or 1099. I'm not sure.

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2 Q. Did she receive a commission at that  
3 time?

4 MR. GOODMAN: Object to form.

5 A. No, no commission.

6 Q. I believe you testified she is an  
7 owner of Spartan Auto Group LLC; is that  
8 correct?

9 A. Yes. She is currently the sole  
10 owner.

11 Q. At the start of Spartan Auto Group  
12 LLC, was she an owner?

13 A. She was not.

14 Q. In May of 2020, was she an owner of  
15 Spartan Auto Group LLC?

16 A. Which one?

17 Q. Spartan Auto Group LLC.

18 A. Yes. She was 100 percent owner.

19 Q. How often does she go to the  
20 dealership in person?

21 A. Every day, sometimes Saturdays,  
22 sometimes Sundays too.

23 Q. Does Victory Mitsubishi have a  
24 separate building other than the one at 4070  
25 Boston Road where it conducts business?

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2 MR. GOODMAN: Object to form.

3 A. It has other locations for offices  
4 for other operations, let's say.

5 Q. What are those addresses?

6 A. I don't know. I don't know them  
7 offhand. I know there is at least two to three  
8 other structures. There is also some storage  
9 yards, but I don't know the addresses.

10 Q. How did the Victory Mitsubishi  
11 dealership adapt to the COVID-19 pandemic?

12 MR. GOODMAN: Object to form.

13 A. They had to follow government  
14 guidelines that were put in place with respect  
15 to selling cars.

16 Q. And the decisions about how to comply  
17 with those guidelines, were they made by you?

18 A. No.

19 Q. Were they made by Diane?

20 A. I am assuming either Diane or Stavros  
21 made those decisions, but for the rest of the  
22 deposition, you know, any question you are  
23 going to ask me about decision making at  
24 Spartan Auto Group, you are going to get the  
25 same answer. I don't operate the place. I

1 P. Argyropoulos

2 don't know what they do there. I am just  
3 trying to save the world some time.

4 Q. I understand. And who is Stavros?

5 A. Stavros is the GM.

6 Q. And how long has he been the GM?

7 A. I think six years maybe, five, six  
8 years.

9 Q. Who made the decision to hire him?

10 A. I think Diane.

11 Q. Who sets the policies as to the  
12 pulling of credit records at Victory  
13 Mitsubishi?

14 A. I don't know. Diane or Stavros.

15 Q. Who set the policies regarding  
16 identity verification at Victory Mitsubishi?

17 A. I don't know.

18 Q. And there was a policy during the  
19 COVID-19 pandemic to allow the sale of vehicles  
20 to consumers in the name of other consumers who  
21 were not at the dealership, correct?

22 MR. GOODMAN: Object to form.

23 A. I don't know what that means.

24 Q. Let me rephrase the question.

25 Because of the COVID-19 pandemic, some people

1 P. Argyropoulos

2 didn't want to go out to places in person to  
3 make purchases.

4 A. Right.

5 Q. So did the dealership allow people to  
6 purchase a vehicle without being in the  
7 dealership themselves?

8 MR. GOODMAN: Object to the form of  
9 the question.

10 A. I don't know that.

11 Q. Has there ever been identity theft at  
12 Victory Mitsubishi?

13 MR. GOODMAN: Object to form.

14 A. I don't know.

15 Q. Was there ever identity theft at  
16 Victory Auto Group?

17 A. Don't know.

18 Q. Have you ever spoken with any police  
19 officers in regards to Victory Auto Group LLC?

20 MR. GOODMAN: Object to form.

21 A. I don't believe so.

22 Q. Have you ever spoken with any police  
23 officers in regards to Spartan Auto Group LLC?

24 MR. GOODMAN: Objection to form.

25 A. I don't --

1 P. Argyropoulos

2 Q. Sorry. I didn't catch the answer.

3 A. I do not believe so.

4 Q. What is the business structure of  
5 Victory Mitsubishi?

6 MR. GOODMAN: Object to form.

7 A. The one that is currently operating?

8 Q. Yes.

9 A. Victory Mitsubishi is a New York  
10 State d/b/a filed in Albany for the entity  
11 known as Spartan Auto Group LLC.

12 Q. Who is the current owner?

13 A. Diane.

14 Q. And you said she was sole owner,  
15 correct?

16 A. Yes.

17 Q. Who were the owners in May of 2020?

18 A. Diane, solo.

19 Q. If you take a look at Exhibit 37  
20 please.

21 (2016 Schedule K-1 marked  
22 Defendants' Exhibit 37.)

23 A. Sure.

24 MR. GOODMAN: 2016 K-1.

25 Q. It is marked Francois 3519. It's a



1 P. Argyropoulos

2 single page.

3 A. Got it.

4 Q. Did you fill out this document or  
5 have this document filled out on your behalf?

6 A. I don't know. I don't know where  
7 this document came from. It is K-1 from '16.  
8 The information on here that is accurate is  
9 that I was the owner, 99 percent. That's  
10 correct.

11 Q. Who owned the other 1 percent?

12 A. I don't know. It might have been an  
13 entity. It's a tax thing the accountant  
14 doesn't want you to own 100 percent. He wants  
15 you to put 1 percent in some other name for the  
16 way he filed taxes, something like that. I  
17 don't know.

18 Q. In addition to for tax purposes, is  
19 it also for liability purposes?

20 MR. GOODMAN: Object to form.

21 A. How would that even be answered?  
22 Liability purposes meaning what? That  
23 99 percent absolves you of liability? You know  
24 that doesn't. That's not true.

25 Q. Let me rephrase the question. For

1 P. Argyropoulos

2 purposes of liability in regards to torts  
3 allegedly committed by the LLC?

4 A. You are an attorney. You know that  
5 answer. You could be 1 percent owner and be  
6 fully liable jointly and severally. Come on,  
7 come on.

8 Q. Similar forms were filed for Victory  
9 Auto Group and Spartan Auto Group in 2020; is  
10 that correct?

11 MR. GOODMAN: Object to form.

12 A. Similar forms like what?

13 Q. Similar K-1 forms.

14 A. In 2020, there would be only one K-1  
15 filed. In 2020, there would be one K-1 filed.

16 Q. That would be for Spartan Auto Group?

17 A. That is correct.

18 Q. What would that K-1 reflect the  
19 ownership to be?

20 MR. GOODMAN: Object to form. Asked  
21 and answered. Go ahead.

22 A. It was answered already on three  
23 different occasions, actually.

24 MS. CATHERINE: Could you read back  
25 the question, please?

1 P. Argyropoulos

2 (Record read.)

3 MR. GOODMAN: You could answer it.

4 It is the same answer. Go ahead.

5 A. Diane owns the company. Diane is the  
6 sole owner.

7 MS. CATHERINE: This is a previously  
8 marked document.

9 Should I just email this to you and  
10 then you can forward?

11 MR. GOODMAN: It is 28.

12 MS. CATHERINE: What is it?

13 MR. GOODMAN: The Bates stamps.

14 MS. CATHERINE: It is Bates stamped  
15 Subpoena Responses 463 to 484.

16 MR. GOODMAN: I have all of those.  
17 They are all in the conference room.

18 Let's take a five-minute break right  
19 now, and I can gather those, and we will be  
20 ready to go in five or ten minutes, if that's  
21 okay.

22 MS. CATHERINE: It's fine with me.

23 (A recess was taken.)

24 Q. What are these documents?

25 MR. GOODMAN: Object to form. Go

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2 ahead, take your time, Phil. There are  
3 several --

4 A. Can't you just ask me a specific  
5 question about a specific document? It is 28  
6 pages. What do you want me to do? Do you want  
7 me to sit here for half an hour?

8 You are familiar with these  
9 documents. It's your case.

10 MR. GOODMAN: Phil, let's just wait  
11 for a question and --

12 THE WITNESS: Sorry. It just seems  
13 like we are wasting a lot of time here.

14 Q. What are the documents?

15 A. You didn't hear anything I just said.

16 MR. GOODMAN: Let's go ahead, Phil,  
17 and just answer.

18 I object to the form.

19 A. I don't know what they are. I don't  
20 know what they are.

21 Q. Are you a signatory to these  
22 documents?

23 A. I might be. I have to look at them.  
24 Too many pages to look at.

25 Q. If you could turn to --

1 P. Argyropoulos

2 A. If you ask specific questions the way  
3 it is supposed to be done at depositions, then  
4 I will answer.

5 Q. If you could turn to the page marked  
6 Subpoena Responses 468, please.

7 A. What page is that, please?

8 MR. GOODMAN: 468, Bates stamped  
9 Number 468. It is the sixth page, 468.

10 THE WITNESS: I don't have anything  
11 Bates stamped here. I am looking at page 6.

12 Q. That's your signature right there?

13 A. Yes, it is.

14 Q. And what is your title there?

15 A. Dealer principal.

16 Q. What does dealer principal mean?

17 A. It means you are the individual that  
18 was awarded a franchise by a manufacturer.

19 Q. If you turn to the page Bates  
20 stamped -- sorry. You said yours aren't Bates  
21 stamped. Page 8 of the PDF.

22 MS. CATHERINE: Just for the record,  
23 this is Bates stamped 470.

24 A. Page 8. Okay. I'm on that.

25 Q. Do you see that this agreement is

1 P. Argyropoulos

2 dated March 1st, 2021?

3 A. I see that, yes.

4 Q. And the prior agreement, if you turn  
5 to the previous page, do you see that is dated  
6 January 30th, 2018?

7 A. Yes.

8 Q. Were there any agreements entered  
9 into by Spartan Auto Group with Mitsubishi  
10 Motors for dealer sales and service agreement  
11 between these two agreements?

12 A. I don't understand the question.

13 Q. Sure. So these are both dealer sales  
14 and service agreements, correct?

15 A. Yes.

16 Q. Are there any other dealer sales and  
17 service agreements between Spartan Auto Group  
18 and Mitsubishi Motors --

19 A. I don't believe so.

20 Q. So the January 30, 2018, agreement  
21 would have been governing on May 30, 2020; is  
22 that correct?

23 A. May 30th of 2020?

24 Q. Yes.

25 A. I think so, yes.

1 P. Argyropoulos

2 Q. If you go to page 2 of your PDF,  
3 Bates stamped 464.

4 A. Okay.

5 Q. Do you see here a bulleted item  
6 number 3, ownership of dealer?

7 A. Yes, I do.

8 Q. And Diane's title is listed as member  
9 here. Why is that?

10 MR. GOODMAN: Object to form.

11 A. I don't know. I guess because I had  
12 a higher percentage ownership.

13 Q. And your title is listed as manager.  
14 Why is that?

15 MR. GOODMAN: Object to form.

16 A. Usually in these situations from a  
17 legal standpoint, manager usually means  
18 managing member, and member is just a standard  
19 member that has ownership.

20 Q. And so that is --

21 A. It doesn't mean manager in the sense  
22 of the word.

23 Q. Sure. So in this case, this is just  
24 referring to you being a managing member rather  
25 than --

1 P. Argyropoulos

2 A. Correct.

3 MR. GOODMAN: Let her finish the  
4 question.

5 Q. And there is a column here  
6 involvement in management (active or inactive,)   
7 and it lists you as active. What does that  
8 mean?

9 MR. GOODMAN: Object to the form.

10 A. I don't know what it means in their  
11 context. You would have to ask Mitsubishi.  
12 They knew I was never there.

13 Q. Did you consult with an attorney  
14 before signing this agreement?

15 MR. GOODMAN: Object to form.

16 A. No.

17 Q. You say they knew that you were never  
18 there. How did they know that?

19 A. They just knew that I wasn't there.  
20 They knew I was not operating the dealership.  
21 They never called me. They called Diane.

22 Q. Was that because you had communicated  
23 that to Mitsubishi Motors to --

24 A. Not necessarily. They knew that.  
25 They knew that I had a full-time law practice.



1 P. Argyropoulos

2 I did not run the dealership.

3 Q. Have you been working with Mitsubishi  
4 Motors since you started getting involved with  
5 car dealerships in 2004?

6 A. To whatever extent needed, yes.

7 Q. Did Victory Auto Group LLC operate  
8 Mitsubishi franchises?

9 MR. GOODMAN: Object to the form.

10 A. No.

11 Q. Did Victory Motors LLC operate  
12 Mitsubishi franchises?

13 A. Yes.

14 Q. If you could take a look at the page  
15 Bates stamped Subpoena Responses 480, it would  
16 be page 18 of the PDF, and this page shows  
17 Diane as the sole owner in the agreement with  
18 Mitsubishi on September 20, 2022, correct?

19 A. You have to look for the date, but I  
20 am assuming yes. Yes, correct.

21 Q. Was Diane ever previously listed as  
22 the manager with 100 percent ownership prior to  
23 this agreement?

24 MR. GOODMAN: Object to form.

25 A. I don't think so.

1 P. Argyropoulos

2 Q. So why did you relinquish your  
3 ownership and Diane became a full owner between  
4 2021 and 2022?

5 MR. GOODMAN: Objection. Form.

6 A. Actually, between 2008 and 2022, it  
7 was always the intention of making her a full  
8 owner, but you can't do that unless you are  
9 qualified to be a dealer principal, and in  
10 order to do that, you have to have some years  
11 under your belt involved in an automobile  
12 dealership for new cars, so it took a while  
13 before we could request that she take over the  
14 complete ownership.

15 Q. I see. And that's a requirement  
16 imposed by Mitsubishi?

17 A. By all new car manufacturers.

18 Q. Is that a requirement by law?

19 A. It's not by law. In order to be  
20 awarded a franchise or be an owner of a  
21 franchise -- I mean a dealer principal, I  
22 should say, you have to have a certain  
23 amount -- it's not written anywhere -- of  
24 experience for them to approve you and grant  
25 you a dealership.

1 P. Argyropoulos

2 In this case, Diane came in with no  
3 experience in '08, so, you know, we let her  
4 run the store all those years until such time  
5 that it was a good time knowing that she would  
6 be approved as an owner, which she was.

7 And the request -- your document  
8 says September '22, I believe. That request  
9 was made back in '16, in December of '16 when  
10 we first went to contract to buy the Bronx  
11 franchise, but they never sent the  
12 application. They sat on it and whatnot. It  
13 was not like it was a problem. It wasn't  
14 urgent.

15 Q. I see. And what changed?

16 A. In what way?

17 Q. Why had they previously sat on it,  
18 for example, in the 2018 and 2021 agreements  
19 but then approved her for full ownership as a  
20 dealer principal in the '22 agreement?

21 A. No. She was already -- she was  
22 already an owner in '18. They wanted her in as  
23 a small percentage. That's why she had the  
24 30 percent. They wanted her to have a small  
25 percentage, and then we should reach out to

1 P. Argyropoulos

2 them to get her to be a full-time owner.

3 I had no interest in being an owner.

4 I had a law practice. I wasn't involved.

5 There was no point in me being an owner of the  
6 company.

7 Q. Did you sell your share of ownership  
8 to her?

9 A. No.

10 Q. Was it gifted to her?

11 A. It was transferred over.

12 Q. And when did that happen?

13 A. In '18. So in '19, she became a full  
14 owner.

15 Q. So why does the 2021 agreement still  
16 list her as a 30 percent owner?

17 A. Well, one has nothing to do with the  
18 other. One is a franchise agreement. They  
19 don't, you know, need you to prove anything.  
20 It is just sloppiness, basically.

21 Q. So they --

22 A. From a legal standpoint, she owned  
23 the company as of 2019, for all intents and  
24 purposes.

25 Q. So the representation on page 9 of

1 P. Argyropoulos

2 your PDF, Bates stamp Subpoena Responses 471,  
3 the representation here that Diane was a  
4 30 percent owner on March 1st, 2021, that  
5 representation is not accurate; is that  
6 correct?

7 A. It's accurate to the extent of she  
8 was a 30 percent owner of a franchise.

9 Q. I guess you are going to have to  
10 explain this to me because I am not super  
11 familiar with this.

12 A. A sales and service agreement is  
13 basically the issuance of a franchise. That  
14 franchise was issued by Mitsubishi to Phil and  
15 Diane. That's it. There's really nothing else  
16 to explain.

17 Q. So --

18 A. So in their eyes, as far as the  
19 dealer sales and service agreement, the  
20 franchise agreement was 70/30, because that's  
21 what they wanted. They want her to have some  
22 ownership.

23 Q. So Diane owned 30 percent of the  
24 franchise even though she was a full owner of  
25 the Spartan Auto Group LLC? Is that what you

1 P. Argyropoulos

2 are saying?

3 A. Correct, depending on the dates;  
4 yeah.

5 Q. And you said she became a full owner  
6 of the Spartan Auto Group LLC sometime in '19?

7 A. In '19.

8 Q. And what prompted that?

9 MR. GOODMAN: Object to form.

10 A. What I told you before. We wanted  
11 to -- I didn't want any part of the company. I  
12 didn't run it. I didn't do anything. She ran  
13 it for a long time.

14 Q. Is that because of the New York  
15 Attorney General action?

16 A. No. That case was settled. What  
17 does that have to do with the price of tea in  
18 China?

19 Q. Sorry?

20 A. It has nothing to do with it. What  
21 does the AG action have to do with it? Why  
22 would you even throw that out?

23 You worried I am hiding my assets?  
24 I have a ton of assets. How about that. You  
25 happy now? It's on the record. Yea.

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2 MR. GOODMAN: Okay. Let's just move  
3 forward.

4 (Dealer Sales and Service Agreement  
5 marked Defendants' Exhibit 38.)

6 Q. If you could open Exhibit 38. This  
7 was one of the new exhibits that was emailed to  
8 you earlier today, the Victory Motors  
9 Mitsubishi agreement Bates stamped Francois  
10 3504 to Francois 3514.

11 A. All right. What's the question?

12 Q. If you could turn to page 3505,  
13 please.

14 A. I'm there.

15 Q. So bullet item number 4, Management  
16 of Dealer, do you see that?

17 A. Yes.

18 Q. Has this provision been the same or  
19 substantially similar in the other agreements  
20 that you have entered into with Mitsubishi  
21 Motors?

22 A. I don't know.

23 MR. GOODMAN: Object to form.

24 THE WITNESS: When are we going to  
25 get questions about the case, Nicholas?

1 P. Argyropoulos

2 Q. Sorry. Do you want to take a second  
3 to talk to your attorney?

4 A. No. I'm just wondering when you are  
5 going to start asking questions about your  
6 case. You are asking questions about a closed  
7 dealership agreement, so where is your  
8 foundation on that? What is it based on? What  
9 are you looking to find out? Or are we just  
10 wasting time?

11 MR. GOODMAN: Can we take another  
12 couple of minutes here? Let me talk to my  
13 client.

14 MS. CATHERINE: Sure.

15 (A recess was taken.)

16 Q. Do you still have that section of the  
17 agreement up?

18 A. Yes. Go ahead.

19 Q. As far as you are aware, has this  
20 section of the agreement changed --

21 A. I don't -- sorry. Finish your  
22 question.

23 Q. -- since the version of the agreement  
24 in 2014?

25 MR. GOODMAN: Object to form.



1 P. Argyropoulos

2 A. I don't know.

3 Q. Is this a standard form agreement?

4 A. I don't know.

5 Q. If you could open Exhibit 39, which  
6 is Bates stamped Francois 3714 to 3722.

7 (Dealer development plan marked  
8 Defendants' Exhibit 39.)

9 MR. GOODMAN: Give me a minute,  
10 because I didn't have that one up. Hold on.

11 MS. CATHERINE: That's fine. Take  
12 your time.

13 (Pause in the proceedings.)

14 MR. GOODMAN: That's the dealership  
15 development plan?

16 MS. CATHERINE: Yes.

17 MR. GOODMAN: Do you have that, Phil?

18 THE WITNESS: Got it.

19 Q. I know you probably have never seen  
20 this specific dealer development plan, but the  
21 agreements you signed with Mitsubishi for the  
22 Victory Mitsubishi dealership had similar  
23 dealer development plans, correct?

24 A. This is for a different dealership.  
25 This is for Grand Automotive.

1 P. Argyropoulos

2 Q. Let me be more specific. Turn to the  
3 page marked Francois 3716.

4 A. Okay.

5 Q. Did the dealer development plan for  
6 Victory Mitsubishi have similar operating  
7 requirements as this one?

8 MR. GOODMAN: Object to form. There  
9 is no foundation or testimony that there was a  
10 development plan for Victory, but go ahead.

11 A. I have no idea.

12 Q. As far as you are aware, the dealer  
13 development plan for Victory Mitsubishi would  
14 have had personnel requirements listing the  
15 same managers as the one on this page; is that  
16 correct?

17 MR. GOODMAN: Object to form.

18 A. That is not correct. I am not aware  
19 of that.

20 Q. What do you remember about the  
21 investigation and subsequent lawsuit against  
22 Victory Motors LLC and Victory Auto Group by  
23 the New York Attorney General?

24 A. I don't remember anything.

25 Q. Were you questioned by investigators

1 P. Argyropoulos  
2 from the New York Attorney General's office in  
3 the course of the investigation or the lawsuit?

4 MR. GOODMAN: Object to form.

5 A. I don't remember.

6 Q. Were any employees of the dealerships  
7 fired based on the results of the investigation  
8 or the lawsuit?

9 MR. GOODMAN: Object to form.

10 A. If I remember correctly, everyone was  
11 fired.

12 Q. Everyone at Victory Motors LLC and  
13 Victory Auto Group LLC?

14 A. That's correct.

15 Q. When did that happen?

16 A. I don't remember.

17 Q. Who made that decision?

18 A. Diane.

19 Q. What do you remember about the Farah  
20 Jean Francois account?

21 MR. GOODMAN: Object to form.

22 A. I don't remember anything about it.  
23 Are you talking about the AG case?

24 MR. GOODMAN: No.

25 Q. No. I am talking about this lawsuit

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2 was brought by Farah Jean Francois.

3 A. Oh, oh.

4 Q. What do you remember about her  
5 account?

6 MR. GOODMAN: Object to form,  
7 "account," but go ahead.

8 THE WITNESS: Yeah. I don't know  
9 what she means by her account.

10 Q. What do you remember about the sale  
11 and financing of the vehicle in the name of  
12 Farah Jean Francois?

13 A. I remember nothing because I was not  
14 involved with anything with this person.

15 Q. When were you first aware that there  
16 were allegations by a consumer that a sale and  
17 financing of a vehicle had happened without her  
18 authorization?

19 MR. GOODMAN: Object to form.

20 A. Also previously asked and answered.  
21 I answered that. I said I didn't know anything  
22 about it until I was told I had to go to a  
23 deposition.

24 Q. Who is Emmanuel Laforest?

25 A. No idea.

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2 Q. Are you aware that this lawsuit  
3 concerns allegation of someone stealing the  
4 identity of Farah Jean Francois?

5 MR. GOODMAN: Objection. Form.  
6 Asked and answered. Go ahead.

7 A. I was told by my attorney.

8 Q. And the person who stole Ms.  
9 Francois' identity, when did he first come to  
10 Victory Mitsubishi?

11 MR. GOODMAN: Objection. Form.

12 A. The person who stole it? You don't  
13 know who stole anything. Can you ask that  
14 question differently, please?

15 Q. Do you not understand the question?

16 A. That's correct, I don't understand.

17 Q. The person who is alleged to have  
18 stolen Ms. Francois' identity is named Emmanuel  
19 Laforest. When did Emmanuel Laforest first  
20 come to Victory Mitsubishi?

21 A. I don't know. I am not at the  
22 dealership.

23 Q. Are video recordings made at the  
24 dealership?

25 A. I don't know.

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2 Q. Who would know that?

3 A. The people that run it.

4 Q. And when you say "the people who run  
5 it," you are referring to --

6 A. The people I have consistently  
7 referred to, Diane and Stavros.

8 Q. Who was the first person to speak to  
9 Mr. Laforest?

10 A. I do not know. I do not operate the  
11 dealership. I was never there.

12 Q. Except for the two to three times a  
13 year you go to the dealership; is that right?

14 A. That is right.

15 Q. Is that a certain day that you always  
16 go to the dealership, or is it based on need?

17 A. It's not based on anything. It's  
18 whenever I feel like it.

19 Q. What brings you to the dealership?

20 A. Maybe I am passing by. Maybe I was  
21 in court in Westchester and I stopped by to say  
22 hello. Maybe I stopped by to have someone look  
23 at my car.

24 Q. When you stop in to say hello, you  
25 are saying hello to Stavros and Diane and the

1 P. Argyropoulos

2 other people who work at the dealership; is  
3 that right?

4 A. That's usually who you say hello to.

5 Q. What is Dealertrack?

6 A. I have no idea.

7 Q. Have you ever attended any trainings  
8 put on at the Victory Mitsubishi dealership  
9 regarding identity theft or credit reporting?

10 A. No.

11 Q. Did you ever attend such trainings  
12 that occurred at Victory Auto Group LLC?

13 A. No.

14 Q. Do you know if such trainings occur?

15 A. I don't know if they occur or not.

16 Q. Who at Victory Mitsubishi  
17 communicated with Ms. Francois?

18 A. I don't know.

19 MR. GOODMAN: Objection.

20 THE WITNESS: Sorry, Nick.

21 Q. Did you speak with Ms. Francois on  
22 May 30, 2020?

23 A. No.

24 Q. Do you know if anyone at the Victory  
25 Mitsubishi dealership spoke with Ms. Francois

1 P. Argyropoulos

2 on May 30, 2020?

3 A. I do not know.

4 Q. Do you know why documents from  
5 Victory Mitsubishi would give two different  
6 dates for the sale of a vehicle such as  
7 May 30th, 2020, and June 29, 2020?

8 MR. GOODMAN: Object to form.

9 A. I do not know.

10 Q. Were you aware of Victory Mitsubishi  
11 having consumers come to the dealership to  
12 re-sign documents as to financing provided by  
13 Capital One?

14 MR. GOODMAN: Object to form.

15 A. I do not know.

16 Q. Does Victory Mitsubishi sell vehicles  
17 to consumers and then arrange for financing for  
18 the vehicle after the consumer has left Victory  
19 Mitsubishi with the vehicle?

20 MR. GOODMAN: Object to form.

21 A. I do not know.

22 Q. In your experience with the auto  
23 dealership industry, is that a practice which  
24 would be risky?

25 MR. GOODMAN: Object to form.



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2 A. I do not know.

3 Q. Do you recall a consumer coming to  
4 the Victory Mitsubishi dealership in September  
5 of 2020 making a complaint about identity  
6 theft?

7 A. I am never there, so the answer is  
8 no.

9 Q. Has Stavros Orsaris ever relayed to  
10 you a complaint by a consumer regarding  
11 identity theft?

12 A. No.

13 Q. Has Diane ever informed of you a  
14 complaint by a consumer regarding identity  
15 theft?

16 A. No.

17 Q. Are you aware that Victory Mitsubishi  
18 has retained the down payment for the vehicle  
19 which was purchased and later returned to the  
20 dealership in this case?

21 A. I do not know.

22 Q. Did Victory Mitsubishi have an  
23 internal investigation about this incident?

24 A. I do not know. I don't operate the  
25 dealership. I do not know.

1 P. Argyropoulos

2 Q. If you could open -- this was  
3 previously marked as Exhibit 32. This was the  
4 one-page marked Subpoena Responses 326.

5 (Pause in the proceedings.)

6 Q. Prior to your preparation for this  
7 deposition today, had you ever reviewed this  
8 document before?

9 A. No.

10 Q. Do you see the section titled  
11 Narrative?

12 A. Yes.

13 Q. Do you have any reason to believe  
14 that the statements in that section titled  
15 Narrative are untrue or inaccurate?

16 MR. GOODMAN: Object to form.

17 A. I don't know.

18 Q. What is the procedure for Victory  
19 Mitsubishi if there is an allegation of  
20 identity theft?

21 A. I don't know.

22 MR. GOODMAN: Object to form.

23 A. I am not in the dealership. I do not  
24 operate the dealership. I do not know for  
25 those reasons.

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2 Q. Who would set that procedure?

3 A. I do not know. I do not run the  
4 dealership.

5 Q. So we looked at the K-1 filing for  
6 Victory Auto Group LLC, and we looked at these  
7 franchise agreements with Mitsubishi Motors,  
8 and you had explained to me that the Mitsubishi  
9 agreements reflected percentage of ownership of  
10 the franchise. Am I recalling that correctly?

11 A. Correct.

12 Q. And so in terms of percent of the  
13 ownership of the LLCs, would that be reflected  
14 by the K-1 filing such as the one we looked at  
15 previously?

16 A. That's correct.

17 Q. And so the K-1 filing should show  
18 that Diane became the sole owner of Spartan  
19 Auto Group LLC in 2019; is that correct?

20 A. Correct.

21 MR. GOODMAN: What was the answer?

22 THE WITNESS: "Correct."

23 Q. And we could open the document  
24 previously marked Exhibit 13, Bates stamped  
25 Subpoena Responses 485 to 489.

1 P. Argyropoulos

2 MR. GOODMAN: That starts at page 24  
3 of whatever I sent you.

4 (Pause in the proceedings.)

5 Q. Have you ever received a spreadsheet  
6 the same or similar to this spreadsheet from  
7 Mitsubishi Motors?

8 A. No.

9 Q. And if you look at the fourth page of  
10 this document, there is a column titled Opening  
11 Comments, and different cells containing  
12 descriptions of complaints. Are you familiar  
13 with any of the complaints contained in this  
14 spreadsheet?

15 A. No.

16 No objection? No, I am not.

17 Q. If you look at the complaint three  
18 rows from the bottom which starts "Cust  
19 daughter is upset that," and so on, if you  
20 could just take a second and read that to  
21 yourself, please.

22 A. Okay, I read it.

23 Q. Are you familiar with this complaint?

24 A. No, because I answered that also. I  
25 am not familiar with the spreadsheet or any of

1 P. Argyropoulos

2 the complaints thereon.

3 Q. This complaint refers to Victory  
4 Mitsubishi putting a vehicle in the customer's  
5 mother's name --

6 A. You don't need to explain it to me.  
7 Is there a question? Do you have a question?  
8 Is there a question? This is a deposition. I  
9 don't need you to explain documents to me. You  
10 have a question? Ask the question and I will  
11 answer it.

12 Q. Does it concern you that Victory  
13 Mitsubishi is alleged to have put a vehicle in  
14 the name of a customer's mother instead of that  
15 customer?

16 MR. GOODMAN: Object to form.

17 A. That doesn't concern me at all  
18 because that has to be resolved. Every  
19 complaint is resolved.

20 Q. What do you mean by that, every  
21 complaint is resolved?

22 A. I don't mean anything by it. These  
23 are allegations that have to play themselves  
24 out. I don't have to explain that to you.

25 Q. Can you take a look at the first

1 P. Argyropoulos

2 page, this is the one marked Subpoena Responses  
3 485.

4 MR. GOODMAN: That is 24 of 28 on  
5 what I sent you.

6 A. I see it.

7 Q. Do you see the column here titled  
8 Final DISP?

9 A. I do.

10 Q. Based on the items in this column  
11 that say unresolved or unsatisfied, does that  
12 change your answer to the previous question?

13 A. Not at all.

14 MR. GOODMAN: Object to the form.

15 A. Not at all.

16 Q. I will represent to you the original  
17 opening date for the complaint regarding the  
18 mother that we were talking about earlier is  
19 dated May 11th, 2022. Does it concern you that  
20 this complaint was made so recently?

21 MR. GOODMAN: Object to form.

22 A. These are complaints that are  
23 pending. It does not concern me unless there  
24 is a resolution unfavorable.

25 And I don't own the business, so

1 P. Argyropoulos

2 technically it doesn't concern me at all.

3 Q. Chris Orsaris is the father of  
4 Stavros Orsaris; is that correct?

5 A. I believe so.

6 Q. Do you know of any other father and  
7 son who work at Victory Mitsubishi?

8 A. I don't.

9 Q. When you first learned of the  
10 allegations made by Ms. Francois, what steps  
11 did you take to determine if the allegations  
12 were true?

13 A. I took no steps at all. I don't run  
14 the dealership.

15 Q. Have you recommended the firing or  
16 disciplining of any employees in regards to the  
17 complaint by Ms. Francois?

18 MR. GOODMAN: Object to form. Go  
19 ahead.

20 A. What part of I don't run the  
21 dealership do you not understand? Which part  
22 is it that you don't understand? You want me  
23 to say it differently?

24 Q. Sure, but you speak with Diane --

25 A. You keep asking questions about the

1 P. Argyropoulos  
2 operation of the dealership. I keep answering  
3 the questions the same way. I don't know. I  
4 do not run the dealership. I do not own the  
5 dealership. Are you going to spend all these  
6 hours asking me questions where you know the  
7 answer is going to be the same?

8 Q. Have you ever provided advice to  
9 Diane or Stavros as to the running of the  
10 Victory Mitsubishi dealership?

11 A. No.

12 Q. Did Victory Mitsubishi sell a vehicle  
13 to Emmanuel Laforest on May 30, 2020?

14 A. Here we go again. I do not run the  
15 dealership. I do not own the dealership. I  
16 have zero information about anything that the  
17 dealership does.

18 Go ahead --

19 MR. GOODMAN: And specifically asked  
20 and answered about Emmanuel Laforest.

21 Q. Have you at any time tried to contact  
22 Farah Jean Francois?

23 A. I do not run the dealership. I do  
24 not own the dealership. I do nothing with  
25 respect to the dealership.



1 P. Argyropoulos

2 MS. CATHERINE: Strike the  
3 nonresponsive answer to the question.

4 Q. Have you at any time tried to contact  
5 Farah Jean Francois?

6 A. No.

7 Q. Are you aware of anything that  
8 Victory Mitsubishi did wrong in the sale and  
9 financing of the vehicle in the name of Farah  
10 Jean Francois?

11 MR. GOODMAN: Object to form.

12 A. They did wrong? What kind of  
13 question is that? Am I aware of something they  
14 did wrong? Did you really seriously ask that  
15 question? That's assuming I am going to take  
16 the position to say there was something wrong  
17 done when I told you I don't run the  
18 dealership, I have nothing to do with the  
19 dealership, I don't own the dealership.

20 Q. And you take no position as to  
21 whether anything was done wrong?

22 MR. GOODMAN: Object to the form.

23 Q. Are you going to answer?

24 MR. GOODMAN: Take no position? I  
25 don't know how he could answer that.

1 P. Argyropoulos

2 Go ahead.

3 A. No. I don't run the dealership and I  
4 don't own the dealership.

5 THE WITNESS: There has to be a way  
6 to stop this line of questioning from a legal  
7 standpoint, Nick. I mean, I have been  
8 practicing 30 years. This is insane.

9 MR. GOODMAN: Emma, listen. I am  
10 trying to be very patient here and let this go  
11 and let you ask your questions. At this point  
12 it really is reaching a point at which I am  
13 going to have to contemplate a motion to  
14 terminate or limit the deposition because we  
15 are just -- this would be under the federal  
16 rules, we are talking about 30(c)(A), to be  
17 specific subdivision 3, that does allow the  
18 termination of a deposition when it becomes  
19 harassing or so far off base that it doesn't  
20 produce any discoverable information.

21 I am not there at this minute, but we  
22 are going to get there very soon because as  
23 much as I want to allow this to go forward, the  
24 witness is correct that he has answered over  
25 and over and over again that he doesn't know

1 P. Argyropoulos  
2 anything about the operation of the dealership,  
3 so let's continue.

4 Why don't we take a five-minute  
5 break, but I am really asking you to seriously  
6 consider how far we are going to keep going,  
7 because I will make that motion if I have to  
8 make it, so let's take a break.

9 MS. CATERINE: Okay.

10 (A recess was taken.)

11 MR. GOODMAN: By counsel, I  
12 previously referred to a rule of Federal Rules  
13 of Civil Procedure, and I misquoted it. It is  
14 Rule 30, and the subdivision is (d)(3) which  
15 concerns and allows for a motion to terminate  
16 or limit a deposition when it is not being  
17 conducted in good faith or in a manner that  
18 unreasonably annoys, embarrasses, or oppresses  
19 the deponent or a party, and that is what I may  
20 invoke subject to ongoing questioning.

21 MS. CATERINE: Understood. I think  
22 we should be finishing up shortly.

23 Q. I just wanted to go back to, you had  
24 mentioned, you had referred to the firing of  
25 employees of Victory Auto Group LLC and Victory

1 P. Argyropoulos

2 Motors after the New York Attorney General  
3 lawsuit. Is that right?

4 A. Everyone who was involved in selling  
5 that product was fired. That's what Diane told  
6 me.

7 Q. I see. Everyone who was involved  
8 with -- it was a window etching product; is  
9 that right?

10 A. That's right, that was not authorized  
11 by Diane to be sold.

12 Q. Do you know which employees those  
13 were?

14 A. I do not.

15 Q. And what conversations with Diane  
16 have you had about this lawsuit or the issues  
17 addressed in this lawsuit?

18 MR. GOODMAN: Objection. Form, and  
19 this may implicate privilege. If you can limit  
20 it to a question whether there were  
21 conversations, that might be appropriate.

22 MS. CATHERINE: Let's start there  
23 then.

24 Q. Did you understand that?

25 A. What's the question?

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2 Q. The question is, have you had  
3 conversations with Diane regarding this lawsuit  
4 or the subject of this lawsuit?

5 A. No, not that I remember.

6 Q. Thank you so much for your time.

7 MS. CATHERINE: Do you have any  
8 questions, Nicholas?

9 MR. GOODMAN: No, nothing.

10 (Time noted: 4:17 p.m.)

11  
12 Subscribed to and sworn \_\_\_\_\_

13 To before me this Philip Argyropoulos

14 \_\_\_\_ day of \_\_\_\_\_, 20 .

15  
16 \_\_\_\_\_

17 Notary Public

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CERTIFICATION

I, HELENE GRUBER, a New York State  
certified shorthand reporter, hereby certify that  
the foregoing transcript is a  
complete, true and accurate transcript in the  
matter of Francois v. Victory Auto Group held on  
November 28, 2022.

I further certify that this  
proceeding was reported by me and that the  
foregoing transcript was prepared under my  
direction.

Date: December 6, 2022



HELENE GRUBER

PHILIP ARGYROPOULOS 30b6  
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Our Assignment No. J8893948

Case Caption: Francois

vs. Victory Auto Group

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury  
that I have read the entire transcript of  
my Deposition taken in the captioned matter  
or the same has been read to me, and  
the same is true and accurate, save and  
except for changes and/or corrections, if  
any, as indicated by me on the DEPOSITION  
ERRATA SHEET hereof, with the understanding  
that I offer these changes as if still under  
oath.

\_\_\_\_\_  
Philip Argyropoulos

Subscribed and sworn to on the \_\_\_\_\_ day of  
\_\_\_\_\_, 20\_\_\_\_ before me,

\_\_\_\_\_  
Notary Public,

in and for the State of \_\_\_\_\_



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DEPOSITION ERRATA SHEET

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Philip Argyropoulos

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DEPOSITION ERRATA SHEET

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Philip Argyropoulos